

Brian S. Lennon  
Stuart R. Lombardi  
Betsy L. Feldman  
Joseph R. Brandt  
WILLKIE FARR & GALLAGHER LLP  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111

*Proposed Counsel for the Debtor*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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:  
In re: : Chapter 11  
:  
Manhattan Country School, :  
a/k/a Manhattan Country School, Inc., : Case No. 25-11009 (DSJ)  
:  
Debtor. :  
:  
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**STATUS REPORT AND REQUEST FOR HEARING**

Manhattan Country School (the “School”), in its capacity as the debtor and debtor-in-possession in the above captioned case, hereby files this Status Report and Request for a Hearing on June 12, 2025 and respectfully states as follows:

1. Since the May 30, 2025 hearing, there have been a number of positive developments in the case. *First*, thanks to the generosity of members of the School community, the School received enough donations to fully satisfy its payroll obligations that were due on May 30, 2025, which effectively ensures that the approximately 250 students enrolled in the School will be able to complete the 2024-2025 school year this week and that approximately two dozen eighth graders will graduate without disruption.

2. ***Second***, on June 1, 2025, upon the request of the Manhattan Country School Parents Association (the “Parents Association”), each of the members of the School’s Board of Directors who were responsible for the filing of this chapter 11 case resigned from the Board.<sup>1</sup> The Board was immediately reconstituted in accordance with the School’s bylaws with five new voting members and one *ex officio* member (the “New Board”). The voting members of the New Board are Slavina Zhelezova, Elka Samuels Smith, Jully Hong, Daniel Green, and Viviana Benitez. The Interim President of the School, Princess Lyles, is the *ex officio* member. Each member of the New Board is the parent of a current student.

3. ***Third***, the School, with the consent of the Parents Association, asked Willkie Farr & Gallagher LLP (“Willkie”) to represent it in connection with the chapter 11 case. Willkie has agreed to represent the School on a *pro bono* basis and is working with the School to prepare and file an application seeking the approval of Willkie’s retention pursuant to section 327(a) of the Bankruptcy Code. In addition, a number of other professionals in the New York City restructuring and finance communities have expressed a willingness to assist the School.

4. ***Fourth***, with its new leadership in place, the School has opened constructive lines of communication with its various constituents, including Flushing Bank (which holds the mortgage on the school building located at 150 West 85th Street (the “Schoolhouse”)), the New York City Law Department and Build NYC Resources Corporation (which originally issued the Revenue Bonds that financed the School’s acquisition of the Schoolhouse), and the Local 2110, UAW labor union (which represents members of the School’s faculty).

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<sup>1</sup> Prior to the governance change, the former Board agreed to withdraw the School’s *ex parte* application to convert this case to a chapter 7 liquidation [Docket Nos. 33, 34].

5. The School is optimistic that these developments will steer this case towards a viable chapter 11 plan, but without doubt, the situation remains critical. The School needs immediate financing so that it can retain its faculty and staff and continue to maintain the School's facilities—both the school building in New York City and the farm property that it operates in upstate New York—throughout the summer. Indeed, the School's next payroll is due on June 17. The School is also working to ensure that it remains in good standing with its insurers, utility providers, and critical vendors.

6. In the coming days, the School intends to continue soliciting proposals from potential lenders and working with its various creditors and counterparties to stabilize the situation.

**The School invites any potential lender to contact Willkie.**

7. The School intends to move through this process quickly. Given that expedited relief may be needed from the Court (e.g., typical “first day” relief), the School respectfully requests that the Court, subject to its availability, reserve time for a hearing on June 12, 2025 to consider potential requests for relief or, at a minimum, for a further status report.

*[Remainder of Page Intentionally Left Blank]*

Dated: June 4, 2025  
New York, New York

WILLKIE FARR & GALLAGHER LLP

By: /s/ Brian S. Lennon  
Brian S. Lennon  
Stuart R. Lombardi  
Betsy L. Feldman  
Joseph R. Brandt  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111  
Facsimile: (212) 728-8111  
[blennon@willkie.com](mailto:blennon@willkie.com)  
[slombardi@willkie.com](mailto:slombardi@willkie.com)  
[bfeldman@willkie.com](mailto:bfeldman@willkie.com)  
[jbrandt@willkie.com](mailto:jbrandt@willkie.com)

*Proposed Counsel for the Debtor*